

EXHIBIT "A"

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Attorneys for Fingerlakes Crossing, L.L.C.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

In re:

CIRCUIT CITY STORES, INC., *et al.*

Debtors.

Case No. 08-35653-KRH
Jointly Administered
Chapter 11 Proceedings

**DECLARATION OF THOMAS J. VALENTI IN SUPPORT OF FINGERLAKES
CROSSING L.L.C.'S RESPONSE TO THE LIQUIDATING TRUST'S FIFTEENTH
OMNIBUS OBJECTION TO LANDLORD CLAIMS (REDUCTION OF CERTAIN
PARTIALLY INVALID CLAIMS, RECLASSIFICATION OF CERTAIN MISCLASSIFIED
CLAIMS, DISALLOWANCE OF CERTAIN INVALID CLAIMS, DISALLOWANCE OF
CERTAIN LATE FILED CLAIMS, DISALLOWANCE OF CERTAIN DUPLICATE
CLAIMS, AND DISALLOWANCE OF CERTAIN AMENDED CLAIMS)**

STATE OF NEW YORK)
)SS:
COUNTY OF ONONDAGA)

Thomas J. Valenti, being duly sworn, deposes and says:

1. I am a Member of the Cameron Group, L.L.C. (the "Management Company").

The Management Company is the managing agent of Fingerlakes Crossing L.L.C. (the

"Landlord") which is the owner of a shopping center located at Fingerlakes Crossing Shopping Center, Auburn, New York (the "Center").

2. I have personal knowledge of the facts set forth in this Declaration and may be contacted at Cameron Group, L.L.C., 6007 Fair Lakes Road – Suite 100, East Syracuse, New York 13057, (315) 362-8808.

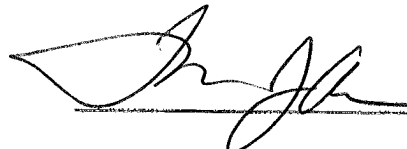
3. The Landlord was a party to a lease (the "Lease") with Circuit City Stores, Inc. (the "Debtor") of premises (the "Premises") at the Center.

4. In the regular course of my employment by the Management Company, I review rent and other charges billed to the Landlord's tenants.

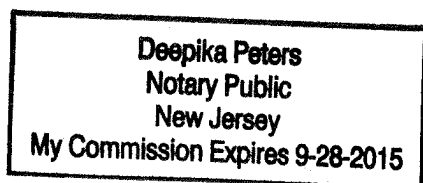
5. The total amount reserved under the Lease from November 10, 2008 until the end of the Lease term is \$2,335,605.08. An itemization of this calculation is attached to this Declaration as Schedule 1.

6. Fifteen percent of \$2,335,605.08 is \$350,340.76. *See* Schedule 1.

7. The Landlord's claim for \$350,340.76 remains due.


Thomas J. Valenti

Sworn to before me this
6 th day of April, 2011


Notary Public

SCHEDULE "1"

Fingerlakes Crossing, LLC
Circuit City Stores, Inc.
Petition Date: 11/10/2008

	11/10/2008- 12/31/2008	2009	2010	2011	2012	2013
Rent	\$25,344.09	\$177,896.00	\$177,896.00	\$177,896.00	\$177,896.00	\$177,896.00
CAM	\$2,896.47	\$20,331.00	\$20,331.00	\$20,331.00	\$20,331.00	\$20,331.00
Estimated Taxes (with 5% annual increases)	\$2,725.65	\$19,132.00	\$20,088.60	\$21,093.03	\$22,147.68	\$23,255.07
Estimated Insurance	\$1,391.46	\$9,767.00	\$9,767.00	\$9,767.00	\$9,767.00	\$9,767.00
Total	\$32,357.68	\$227,126.00	\$228,082.60	\$229,087.03	\$230,141.68	\$231,249.07

	2014	2015	2016	2017	01/01/2018- 11/30/2018	Total
Rent	\$177,896.00	\$177,896.00	\$177,896.00	\$177,896.00	\$163,071.33	\$1,789,479.42
CAM	\$20,331.00	\$20,331.00	\$20,331.00	\$20,331.00	\$18,636.75	\$204,512.22
Estimated Taxes (with 5% annual increases)	\$24,417.82	\$25,638.71	\$26,920.65	\$28,266.68	\$29,680.01	\$243,365.89
Estimated Insurance	\$9,767.00	\$9,767.00	\$9,767.00	\$9,767.00	\$8,953.08	\$98,247.55
Total	\$232,411.82	\$233,632.71	\$234,914.65	\$236,260.68	\$220,341.18	\$2,335,605.08

15% of Total Rent Reserved: \$350,340.76